DOCUMENT RESUME

ED 194 005 HE 013 217

TITLE	Funding Quality Improvement: Lessons from the FIPSE Experience. Proliferation and Agency Effectiveness in Accreditation: An Institutional Bill of Rights. Current Issues in Higher Education, No. 2, 1980.
INSTITUTION	American Association for Higher Education, Washington, D.C.
PUB DATE	80
NOTE	38p.: Papers presented at the Annual Meeting of the American Association for Higher Education (Washington, DC, March 1980).
AVAILABLE FROM	American Association for Higher Education, Suite 780, One Dupont Circle, Washington, DC 20036 ($3.50)
EDRS PRICE	MF01 Plus Postage. PC Not Available from EDRS.
DESCRIPTORS	Accreditation (Institutions): *Accrediting Agencies: *Agency Role: College Role: *Educational Improvement: *Educational Quality: *Federal Aid: Federal Programs: Institutional Autonomy: Instructional Improvement: *Postsecondary Education: Professional Associations: Program Evaluation
IDENTIFIERS	Council on Postsecondary Accreditation: *Fund for Improvement of Postsecondary Education

ABSTRACT

Two papers, and a commentary for each, are presented. In "Funding Quality Improvement: Lessons from the FIPSE Experience," by Charles I. Bunting, the development, strategies, and evaluation of the federally funded Fund for the Improvement of Postsecondary Education (FIPSE) are described. It is noted that FIPSE's strategy for achieving learner-centered improvement assumes that the best and most appropriate creativity, analysis, programmatic wisdom, and ultimate responsibility are at the local level. Other possible applications of this strategy or its premises are explored. Commentaries are provided by Charles Bingman, Sol Pelavin, and Kenneth W. Tolo. "Proliferation and Agency Effectiveness in Accreditation: An Institutional Bill of Rights," by H. R. Kells, discusses the increasingly acknowledged interaction of the institutions with the accrediting agencies as the institutions attempt to weigh the benefits of accreditation against the costs. Four recommendations are made regarding agency proliferation and duplication (reduction, coordination, and efficiency and control of visits and reports), and six recommendations are made concerning agency effectiveness (validation of standards, on-campus staff assistance, evaluation team activity improvement, appeal rights, and representation of the Council on Postsecondary Accreditation). An institutional bill of rights incorporating these ideas is provided. Commentaries are given by Robert L. Ketter, William H. Knisely, and Kenneth E. Young. (MSE)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED194005

1980 NO. 2

Current Issues In Higher Education

Funding Quality Improvement: Lessons from the FIPSE Experience

Proliferation and Agency Effectiveness in Accreditation: An Institutional Bill of Rights

HE013212

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION
THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

"PERMISSION TO REPRODUCE THIS MATERIAL IN MICROFICHE ONLY HAS BEEN GRANTED BY
American Association for Higher Education
TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

American Association for Higher Education

AAHE

The American Association for Higher Education is a national organization open to all individuals concerned with the value and effectiveness of higher education. Each year AAHE's National Conference on Higher Education brings together some 2,000 educational administrators, faculty, students, representatives of accrediting and testing agencies and education associations, government and foundation officials, and others, to discuss common concerns, disseminate effective educational practices, and focus on the future of higher education. The theme of the 1980 Conference was "Improving Quality During Hard Times: An Action Agenda."

The papers presented at that meeting form the basis for this publication. These papers were reviewed by a committee of AAHE members and 17 were selected for publication in this series. They have been grouped into six volumes published serially. Each volume focuses on one aspect of the quality improvement problem: improving teaching; the role of two external agencies; declining faculty salaries; new models for general education; the contributions of adult development theory; and national, state, and institutional strategies for retrenchment.

AAHE members receive a subscription to *Current Issues in Higher Education* as part of their membership fee. Copies of individual issues of the series are available from AAHE. See the list on the inside back cover.

Board of Directors 1979-80

President
Martin A. Kramer, former senior fellow, Carnegie Council on Policy Studies in Higher Education

Vice President (President-Elect)
Martha E. Church, president, Hood College

Past President
Wilbert J. McKeachie, director, Center for Research on Learning and Teaching, The University of Michigan

Members
Alexander W. Astin, professor of higher education, University of California, Los Angeles; president, Higher Education Research Institute, Inc.
Marie Childers, Department of Higher Education, Indiana University
R. Morton Darrow, vice president, Public Affairs, The Prudential Insurance Company of America
Paul A. Elsner, chancellor, Maricopa County Community College District
Arturo Madrid, associate dean and executive officer, College of Liberal Arts, University of Minnesota
Colette Mahoney, RSHM, president, Marymount Manhattan College
Robert F. Sexton, deputy executive director for planning and policy, Kentucky Council on Higher Education
Donald M. Stewart, president, Spelman College
Elizabeth Wells, consultant, Cincinnati, Ohio
Willard Wirtz, chairman of the board, National Institute for Work and Learning

Current Issues in Higher Education
Vol. 2, No. 2
September 10, 1980

Current Issues in Higher Education (ISSN 0070-1971) is published six times a year—weekly from the first week in September through the second week in October—by the American Association for Higher Education, One Dupont Circle, Suite 780, Washington, D.C. 20036 (202/293-6440). AAHE members receive the publication as part of their membership fee; $9 of the fee covers the subscription cost. Subscription price for nonmembers is $15.

Application to mail at second-class postage rates is pending at Washington, D.C. POSTMASTER: Send address changes to American Association for Higher Education, One Dupont Circle, Suite 780, Washington, D.C. 20036.

page

Funding Quality Improvement: Lessons from the FIPSE Experience 1

Charles I. Bunting

Commentary—Charles Bingman, Sol Pelavin, Kenneth W. Tolo 11

Proliferation and Agency Effectiveness in Accreditation: An Institutional Bill of Rights 19

H. R. Kells

Commentary—Robert L. Ketter, William H. Knisely, Kenneth E. Young 27

Copyright 1980, American Association for Higher Education

Foreword

The theme of the AAHE 1980 National Conference on Higher Education was "improving quality in higher education." While most of the sessions focused on efforts from within the institutions—in areas such as personnel and curriculum—the two articles in this monograph highlight the role and impact of two external agencies in the improvement process.

The first paper, by Charles I. Bunting, describes the approach to financing improvements taken by the federal government's Fund for the Improvement of Postsecondary Education: How the Fund's approach differs from others; in what areas it has been most successful; whether lessons learned from its work can be transferred to other federal agencies or other issues, such as energy conservation or health care delivery. The first major evaluation of the Fund has just been concluded, and its results are summarized first by Bunting, and then by the chief evaluator, Sol Pelavin. Charles Bingman, executive director of the President's Management Improvement Council, and Kenneth W. Tolo, associate vice president for academic affairs of the University of Texas at Austin, each discuss whether and in what ways the Fund's approach to balancing local responsibilities with federal support and oversight can be applied in other government departments.

The second paper, by H. R. Kells, discusses the interactions between institutions and accrediting agencies, the areas needing improvement, and what he considers to be a reasonable set of expectations and institutional rights with respect to accreditation. He calls for a stronger, more coordinating role for the Council on Postsecondary Accreditation. Kells proposes that the accrediting community adopt an Institutional Bill of Rights in Accrediting to reduce proliferation and duplication, and to improve the effectiveness of accrediting activities. Reactions to his proposals are offered by Kenneth E. Young, president of the Council on Postscondary Accreditation, and by Robert L. Ketter and William H. Knisely, two college presidents affected by multiple accrediting agency requirements.

Funding Quality Improvement: Lessons from the FIPSE Experience

Charles I. Bunting

Early in 1973, a largely unknown program unit calling itself the Fund for the Improvement of Postsecondary Education sent to the field guidelines for a competition entitled the Comprehensive Program. The Fund was operating under a legislative mandate to encourage and support "the reform, innovation, and improvement" of postsecondary education. Now, seven years later—in addition to the famous "itch"—several other developments make it particularly timely to take stock of the Fund's past experience.

In particular, an extensive external evaluation of key aspects of the Fund's impact is now underway, and while it has not yet been completed many of its findings have been public for the past several months. The evaluators raise concerns and criticisms on some aspects of the Fund, the receipt and use of final reports, for example. However, the principal findings and conclusions are overwhelmingly positive and are gratifying to those who have had high hopes for the Fund.

Indeed, the evaluators tell us that a positive federal program evaluation is such a rare event that one should not lose the opportunity to study the beast more closely. Federal research and development programs generally, but certainly in education, have received their share of criticism over the years, in part because of their apparent lack of impact on actual practice in the field. If the Fund is a program that works, that has had demonstrably significant impacts, it may be helpful to qualify those sweeping indictments as well as to convey whatever experience might be useful to those designing future programs.

This paper seeks to identify a few of the possible implications of the Fund's approach and experience. The general theme might be summarized as follows: Federal programs must be designed to more adequately and accurately analyze the particular sector or field one is trying to reach, and achieve an appropriate "fit" among the field being served, the goals one is pursuing, and the strategies one selects to get there. And in education, particularly in areas of quality, content, and method, the dual realities of local responsibility and indirect federal influence must be more intelligently exploited.

Let me first review some key aspects of the evaluation results and of the Fund's approach. Of course, on the subject of the Fund, I can lay no claim to objectivity; nonetheless, an insider's perspective on the Fund's experience and meaning may have its own value, when added to the assessments and interpretations of others.

Charles I. Bunting is acting director of the Fund for the Improvement of Postsecondary Education, U.S. Department of Education. The views expressed here are the author's, and do not necessarily reflect those of the U.S. Department of Education.

Evaluation findings

In general, the evaluators conclude that very significant impacts have resulted from projects supported by the Fund. In their local settings, 79% of the projects intending to continue do so in some recognizable form. A full 70% continue very substantially, providing the same or greater levels of service than during the period of Fund support. A second basic conclusion is that roughly the same proportion of projects, 65-70%, have significant impact in other settings—often several others—through adaptation, replication, or other major forms of influence. Third, requests for and dissemination of information about projects is particularly widespread during the life of projects, even though this is not a significant budget item for most grantees.

For the large number of projects that continue, other federal funds are rarely utilized; rather, support is typically from local and state sources, and occasionally from private foundations. Budgets for more than 40% of the continuing projects exceed the levels attained during the grant period. However, 69% of the projects indicate that they could not have begun operation had the Fund not provided initial support. Finally, and I think particularly noteworthy, 35% of the project directors had never previously applied for federal support of any kind.

Other findings are more descriptive but equally pertinent. The evaluators term Fund projects "multi-dimensional," by which they mean that the projects have multiple purposes and diverse impacts. Seventy percent of the projects provide direct services to learners—instruction, counseling, information—while the rest initially affect second-level providers, such as faculty and staff. Only 7% of the projects can be termed research. Two-thirds of projects address in significant ways the needs of "non-traditional clienteles"—minorities, women, older students, among others. One-fourth of all projects are sponsored by the wider range of providers of services, beyond colleges and universities. And finally, as most know, grants are relatively small and short-term: averaging $75,000 and two years' duration.

The Fund's strategy

In true social science fashion, I will avoid assertions of causality. Whatever success we have attained is probably due to the kinetic-electro-chemical response triggered in the cortex upon hearing the acronym, FIPSE. Nonetheless, there is fairly substantial correspondence between these major findings and the original *intentions* of the Fund: to seek to benefit learners and learning; to accomplish *lasting* improvements; to achieve wider impact; to affect the climate of institutions and the field; to identify new leadership. It may be useful, then, to review key elements of the Fund's approach. These elements reflect some pragmatics; for example, considerations of what was possible with a small budget and permissible *vis a vis* other federal programs. But more importantly, they reflect at least pieces of a theory, albeit homegrown, of how change occurs—or, sometimes, ought to occur—in postsecondary education. Thus, if the resulting strategy has met with success, there may also be some contribution to more generalized theories of change.

To set the stage, what was the Fund shooting at? What did it mean by an "improvement?" At the risk of being telegraphic, there are three general criteria or "goals" we apply to all proposals.

First, projects should be *learner-centered*. The phrase attempts to capture what is, or should be, the heart of the matter in postsecondary education. The Fund is interested in improving opportunities for learners, either directly or

indirectly, but in all cases we want to see the link between the activity funded and benefit to the client. This concept—really, the Fund's overall goal can be called learner-centered improvement—soon proved to be of profound significance, both as a review criterion and as an organizing principle for many subsequent tasks and steps. As just one example, to be learner-centered is to support improvements sponsored by the full range of service providers to which people actually turn for assistance. Hence, community organizations, labor unions, libraries, museums, and public television, in addition to colleges and universities, should be eligible. Surprisingly, within the large array of federal education programs, the focus on learning and the learner also proved to be perhaps the most distinctive characteristic of the Fund's portfolio of projects.

Second, projects should be *cost-effective*. This phrase represented not a technique, but rather a general conserving principle: more education for the same dollar or the same value for fewer dollars; change taking place via reallocation of program resources rather than requiring the addition of new resources. In practical terms, it meant that we learned to ask a lot of questions about the long-term feasibility of projects and likelihood of adequate resources to continue them.

Third, projects should have *far-reaching impact*. Faced annually with about 2,000 proposals, judgment on the broader significance of a project's potential success (or failure) became an essential consideration. And to gauge its potential for wider relevance, we increasingly turned to a broad range of practitioners and the lay public for advice.

How, then, does a program seek these general outcomes? Let me structure my remarks around four elements that have been highlighted in the Fund's guidelines each year, and identify some of their underlying premises.

1. The Fund is *field-responsive*, deliberately leaving to applicants the tasks of identifying priorities, analyzing problems, and conceiving and developing solutions to them. This strategy reflected several key premises: first, the "where else" premise. We weren't smart enough to think of anyone better qualified to initiate learner-centered improvements than those responsible for services, although applicants sometimes had suggestions—as in the case of a proposal to hire 10,000 unemployed mathematicians, using our entire budget to develop all needed innovations on an abandoned Air Force base. Second, at least in education, issues of the quality and design of programs and services are, ought to be, and anyway are *perceived* to be, local responsibilities. Hence, the adage that lasting change must come from within the organism was fully embraced, again for reasons of both philosophy and strategy. This concept is particularly central to the Fund's strategy. It places the grantees in the position of the pioneers moving west, and the Fund in the position of the supportive but somewhat anxious St. Louis investors: both have collaborative and essential roles, but they are importantly and significantly different roles.

2. The Fund is *comprehensive*, at two important levels. The program mandate and guidelines are comprehensive and set no preordained categories or fixed parameters. In large part this is to insure again that proposals reflect genuinely local priorities and concerns. Also, local projects themselves can be comprehensive, spanning the full complexity of an idea. The grant may not fund all aspects, but the proposal and project director are responsible for taking into account the full range of concerns and thus, we hope, strengthen its chances of influencing and being incorporated into the complex postsecondary education system.

3. The Fund is *action-oriented*, generally supporting operations, but always looking for local impact within a relatively short period of time. This element has

several origins. First, we needed to distinguish ourselves from NIE, the larger research agency established simultaneously. Second, our budget was too small to have major impact in areas requiring long-term development, such as technology. But more important, it seemed eminently sensible—that a program whose mandate is to encourage improvement might as well *fund* actual improvements. This concept, too, has significant bearing on policies: For example, supporting projects in real environments rather than laboratories; generally supporting projects that have moved beyond the initial planning stage; limiting the amount and length of external funding to insure that the improvement remains locally feasible and is not distorted by the external intervention. In addition, this has meant that practitioners rather than planners or analysts would be the typical project directors.

4. The Fund is *risk-taking*, seeking to support the reform and improvement rather than the maintenance or preservation, of key aspects of the enterprise. One of the key proposal criteria is worded, "Does this represent an improvement upon, or useful departure from, existing practice?" We expected to fund a good number of significant innovations, as well as quieter reforms, and we have. However, the key concept remained "potential improvement"—not change for its own sake. We have sought to fund the "entrepreneurial margin" of postsecondary education, and the figure on the number of project directors who are new applicants to the federal government may be indicative. When combined with other elements, however, Fund project directors are likely to be *pragmatic* entrepreneurs, whose ideas are of a nature and at a stage of development such that they may take hold if all goes well.

I fear that this kind of analysis leaves one with the impression that these concepts and policies sprang into life full-blown from some process of deductive reasoning and planning. In fact, the development of this overall strategy was inductive and iterative, during the program's actual implementation, as each new question presented itself: How can we enhance the possibilities for continuation of a good project from the start? How do we choose from among a too-large number of feasible local projects? How do we avoid the "writing proposals to fit guidelines" syndrome? On these and other concerns, we also learned what to do by identifying the pitfalls earlier programs had experienced. I remember that we sometimes called the Fund a "second-stage" grant program.

It is also important to note that not only the Fund's program strategy but also its operational structure and staff pattern evolved in this inductive, developmental fashion, responding to the dictates of both the mission we were attempting to carry out and the nature of the field we sought to influence, as well as the dictates of the governmental environment. More on this later.

Toward a theory of appropriate action

To summarize, the Fund's strategy for achieving learner-centered improvements assumes that the best and appropriate sources of creativity, of analysis, of programmatic wisdom, and of ultimate responsibility are at the local level—at or near the point of service delivery to learners. And improvement approaches that are at greater distance from this locus must also be judged on the basis of their eventual benefit to those same learners. The role of the funding agency is to facilitate and maximize the potential strengths and benefits of these improvement approaches. As a federal agency, and forced to choose a few among many contenders, the Fund must further select those local improvements that address significant problems and have broader potential impact for education and society. And to make this judgment, we return to the field and the broader community for

soundings, while retaining the ultimate responsibility for selection. The Fund continues to depend upon and to foster these same allies to achieve, where justified, local installation of projects, wider application, and dissemination.

Few, if any, of the elements of this strategy are novel. However, the evidence may indicate that the Fund has more thoroughly and consistently implemented the strategy while remaining true to its underlying philosophy, and that it correctly gauged its appropriateness to bring about change in the postsecondary field.

The question, now, is: does this strategy or its premises have other applications, beyond the domain of programmatic improvements in postsecondary education? The balance of this paper attempts an initial exploration of this question, admittedly sketchy and speculative. I will first compare the approach to alternative "improvements" or "problem-solving" strategies, then share for your consideration a range of possible applications.

A simple typology of federal programs

Existing research and development policies in the government have been subjected to widespread criticism in recent years. In addition to other sources for these critiques—anti-intellectualism, fiscal and philosophical conservatism—one impetus has been the perceived failure of many research and development programs, their minimal impact and return from public and private investments toward the improvement of society's institutions. This critique has been applied particularly to the federal role in education: to research programs, to planned and directed experimental programs, to evaluation studies, and to looser, "money on the stump" discretionary grant programs, and to institutional aid programs. I will briefly discuss the Fund's approach in relation to three general program strategies, beginning with directed research, analysis, and experimentation.

David Cohen and Charles Lindblom in their recent book, *Usable Knowledge: Social Science and Social Problem Solving*, distinguish between traditional professional social inquiry and what they call "ordinary knowledge." "Professional Social Inquirers," unfortunately called PSI's in the book, "greatly overestimate the amount and distinctiveness of the information and analysis they offer for social problem solving. They greatly underestimate the society's use—and necessary use—of an existing stock, as well as a flow of new ordinary knowledge from sources other than professional social inquiry." Ordinary knowledge is defined as that which "does not owe its origin, testing, degree of verification, truth status, or currency to distinctive social inquiry techniques but rather to common sense, casual empiricism, or thoughtful speculation and analysis."

Unfortunately, the authors are more concerned with clarifying the proper role for research than exploring further this concept, but I do find it a helpful beginning. I would argue that the Fund's approach lies somewhere in between, yielding more than "ordinary knowledge": the deliberate strategies carried out by the projects and measures for determining their success represent more than "casual empiricism," and mere speculation or analysis devoid of action is inadequate; on the other hand, we do rely on a fair portion of common sense.

Nonetheless, it is clear that the Fund's approach is different from traditional social inquiry strategies and to some extent represents a challenge to them, since the outcomes that apparently have flowed from the Fund projects are those associated with the goals of research and development. It would appear that a great deal of "usable knowledge" is being generated: new ideas and modified practices have been conceived and designed, locally implemented, successfully transferred to other settings, and widely disseminated.

It might be useful, then, to consider points of difference between the Fund's approach and more traditional research and development:

- Typically, the Fund turns to practitioners rather than analysts or researchers for projects design and control.
- The initial impetus for a project is a perceived need or problem at the local level, rather than the conclusions or findings of studies and commissions in broader domains.
- The problem being addressed is analyzed (and judged by the Fund) in terms of the state of the practice rather than the state of the research.
- The response or proposed solution to the problem is judged for its actual feasibility, as well as its conceptual appropriateness.
- The environment within which the project is implemented is real rather than artificial. For all parties, the stakes are actual rather than hypothetical.
- Dissemination of information about the project is encouraged from the first day, rather than after the project has concluded and its evaluation completed.
- The proposal reader and, later, recipient of information about the project is expected to judge its relevance and merit on the basis of his or her informed instincts, in addition to eventual evaluation results.
- Mid-course corrections represent a possibility for strengthening the strategy, or responding to a changing environment, rather than an unfortunate change in the original goals and evaluation design.
- Assessment of the project's success goes beyond the boundaries of the project itself, beyond attainment of internal project goals, to include considerations of local and wider acceptance and long-term feasibility.

At the most abstract level, the Fund's approach represents an alternative to a linear model of planned change which moves from problem identification, to review of research, to controlled experimentation, to evaluation, to dissemination—and finally to implementation. The Fund's approach is at once less linear—things happen simultaneously, ripples move outward in all directions—and less predictable—steps get reversed or eliminated altogether.

I have been contrasting the Fund's approach, probably not wholly impartially, with a general class of directed and experimental research. At the other end of a continuum, one might place a cluster of program activities that represent an "institutional assistance" approach. In these programs, support tends to be provided for generalized activities or functions, rather than for specified projects. Participation in the program is more dependent upon meeting eligibility requirements—either by institutions themselves or by programs or units within them. Review criteria tend to emphasize standards for qualification and the assessment of existing conditions, rather than future goals and program strategies. Project leadership tends to reside with the administrative head of the institution or the unit or program qualifying for support. Little monitoring is called for, particularly on programmatic (as opposed to fiscal) matters, since outcomes are not specified at the point of funding. Rather, the government has determined that it is in society's interest to subsidize a general class of activities or institutions and/or that the best means for achieving a certain end is to provide open-ended support for broad functions.

The Fund's approach also differs, of course, from this model of institutional assistance. Support is provided for specified project goals and activities; criteria focus on problem, goal, and strategy; project leadership is determined by the nature and structure of the activity funded; monitoring is collegial and geared to attainment of project goals.

The third general type of federal program falls somewhere between the directed research and institutional assistance models. A large number of the federal discretionary grant and categorical programs in education, including the Fund, would be placed within this grouping. For lack of a better term, I will call these "improvement" programs. Congress determines that it is in society's interest to achieve a certain general goal—developing bilingual curricula, strengthening the education-to-work transition, spreading knowledge of the metric system, improving postsecondary programs and services for learners. Subsequently, the executive branch decides, if the Congress hasn't already specified, that a competitive project grant program is the best way to achieve that goal.

Particular purposes and specific strategies vary considerably. Nonetheless, most of these programs, including the Fund, share some common characteristics and properties. They specify priorities but also rely upon educators to spell out project activities. The use of the grant award instrument—itself an appropriate mechanism for the federal role in education—insures that the recipient institution will have some discretion over project planning and management. Recipient institutions can be held generally accountable for attainment of project goals. And these federal programs tend to value continuing impact as a general goal—either through the use of products and materials resulting from the project, or through institutionalization of projects locally and impact beyond, or both.

Outcomes of these "improvement" programs, however, also appear to differ. The recent Rand "change agent" study of four such programs found little lasting change resulting from those federal investments—5 to 15 percent of the projects continued locally beyond the grant period itself. The evaluators identified weaknesses in program strategy and implementation that sound conflicting but in fact are not: guidelines were overly specific and directive regarding funding priorities and qualifying "solutions"; and second, grant recipients rarely evidenced genuine commitment to the goals or resource needs of the program. Some programs tended to exercise little quality control during the review process regarding conceptual soundness or local feasibility.

Interestingly, the Rand study claimed to find some evidence and speculated further that projects which evidenced in their beginning stages local commitment, involvement of appropriate parties, and initial planning were more likely to achieve lasting results. Formal evaluations of federal program impact are too few in number, and perhaps too early in development, to draw firm conclusions. Nonetheless, Rand's list of project characteristics that correlate with lasting impact are also central to the Fund's strategy and philosophy, as described earlier.

Achieving a better "fit" in federal programming

I would like to share some thoughts—more speculations than conclusions—about this typology of federal program strategies and, indirectly, the evaluation results. In general, I think far too little attention has been given at the federal level to the significant relationships among four variables: the federal role in a given field, the program mission, the nature of the intended clientele, and the strategies used to implement the program mission. We have not always arrived at the best "match" or "fit" between the strategy selected and the purpose being served or the clientele being reached. As a result, program effectiveness has suffered.

Nor do I mean anything fancy here: rather, I am referring to a very basic level of considerations. Nonetheless, they may suggest a useful line of inquiry for planning at the federal level. As examples, the following thoughts relate to my typology of three federal strategies.

The "improvement" strategy, as I have called it, makes good sense for a

number of federal program missions in education, since it permits both priority-setting at the federal level and considerable responsibility for choice, planning, and operations at local levels. Thus, paralleling the grant instrument itself, it has the potential for reflecting the fact that while the federal government has a genuine interest, local authorities, public and private, run schools.

More "directive" federal improvement efforts—as exemplified by large-scale experiments, demonstrations, and "planned variations"—represent strategies that do not as comfortably "fit" the federal role in education, particularly on matters of program policy, curriculum, and instruction. They will have fewer "natural" tendencies toward realistic conditions, local acceptance, and on-going dissemination, and should both be selected with caution and implemented so as to improve their potential for actual impact.

Program effectiveness may suffer when messages (and strategies) are mixed. Programs in the "improvement" category sometimes profess to rely upon local levels for creativity and project design, but also include in guidelines prescribed solutions to problems and other requirements and limitations belying that philosophy. As a result, applicants can conclude they must "write to the guidelines."

In other cases, aspects of these "improvement" programs may appear to be closer to the "institutional assistance" model. In review criteria and funding decisions, substantive and programmatic considerations can be given less attention than fiscal and administrative concerns. Program merit can be given less priority than achieving balance on institutional type or geographical dimensions.

Indeed, some discretionary programs may in actuality have been intended by the Congress much more as programs of institutional assistance than program improvement. One is particularly tempted to draw that conclusion when eligibility to participate in a program is sharply limited to certain types of institutions or agencies. It would perhaps improve program effectiveness to acknowledge such realities from the start.

The following thoughts would, on the other hand, mostly pertain to programs within the "improvement" category.

In education at all levels, local rather than federal officials are responsible for most matters, particularly in areas of program and content. Hence, they will have a powerful voice in decisions on whether federal "improvement" projects continue with local support. Federal program strategies might take full cognizance of this basic fact of life and use review criteria and methods that can more fully gauge potential interest and commitment at the outset of a project.

The field of education has its own numerous dissemination systems, both formal and informal—associations, conferences, periodicals, department meetings, faculty lounges. Federal programs might turn more to these "natural" systems of dissemination, rather than to centralized clearinghouses and systems, to convey information and generate interest in their projects.

Teachers and counselors, rather than administrators, planners, and researchers, are left with the ultimate responsibility for serving clients and must themselves make innumerable plans, decisions, and choices about how to best do so. Federal programs are looking for ideas that will improve practice in feasible ways. Therefore, they need to take the extra steps necessary to insure that guidelines reach—and speak to—these ultimate providers of the services, rather than to those at intermediary, more removed levels.

Practical applications

How, then, might the Fund's experience be useful for others to review regarding future federal programming? First, I should start by clarifying some limits. The

Fund's approach to social problem-solving would not have resulted in voluntary proposals from the superintendent to desegregate the Boston Public Schools or from the director of athletics to equalize college spending on sports for women and men. (On the other hand, given that such decisions have been made, creative local approaches to compliance might be more effective then centrally specified solutions or procedures.) Nor would most aspects of the Fund's approach be particularly applicable to the conduct of basic research. Nor, certainly, to administering formula aid programs which allocate everything from dollars for library books to science equipment to student aid.

For starters, then, I would eliminate actions and domains that are regulatory, primarily concerned with eligibility, or with basic research. And there surely are several others.

More appropriate territories are those sectors or related to those concerns in which the government has an interest or mandate to solve problems, serve needs, or foster reform and improvement—but *not* through a predetermined and specified solution. The cluster of "improvement" programs in my earlier typology would certainly be included. Perhaps some of the legislated purposes of other programs presently in the "directed research" and "institutional aid" cluster as well. A few candidates are discussed below.

First, what about within the Fund itself? Our own commitment to continue to support field-based approaches to learner-centered improvement is reinforced by the results of the evaluation. With additional funding, however, should we test our wings beyond programmatic, or "learner-centered" improvements? Would the field-responsive strategy, identifying good practice and promising ideas, work when applied to other improvement needs in the field such as: strategies for saving on fuel costs; cost-effective approaches to eliminating physical barriers for the handicapped; the areas of fiscal management and budget planning? And, it is tempting to consider *kinds* of intervention other than the Fund's typical operational projects, but which continue to tap the knowledge of local practitioners. One example: efforts to analyze and synthesize the outcomes of groups of action projects. (We are presently planning one such competition.) Finally, we hope there will be other interagency, cooperative opportunities, such as last year's successful program with the Department of Labor on unemployed youth. DOL had learned of our method of identifying new approaches and good practice, and asked us to administer a program designed to more fully involve colleges with this need. In this manner, the Fund can have a wider impact with its philosophy and strategy by attracting other resources to complement our chronically minimal budget.

Second, next closest to home, one might speculate that other "improvement" programs in postsecondary education should consider aspects of the Fund's approach, since it may have proven particularly appropriate to the nature of the universe and clientele they are seeking to reach. Categorical programs could well be clearer on the problem being addressed but much more open to the full range of known and unknown solutions *and*, significantly, to the range of agencies and individuals with effective solutions to offer. I discussed earlier the Fund's broad eligibility, supporting as it does a wide range of agencies beyond colleges. It is encouraging to find somewhat similar provisions now in the Senate and House versions of the broadened Title I authority. In addition, such programs might be well-advised to consider other strategies—as one example, ways for projects to spread usable information about their work at all stages of their development.

Still on the subject of postsecondary education, consideration should be given the development of modest "funds for improvement" at state levels, as the Carnegie Commission recommended in its recent final report. Such programs

would not duplicate the work of the federal fund since their emphases and priorities would differ—as, indeed, they have in California and Florida, two states that have experimented with innovative funding.

Third, would elementary and secondary education benefit from a modestly-funded improvement program paralleling the Fund, although with differing strategies, given this sector's different structures and cultures? In fact, efforts have been made to create such a program over the past few years; perhaps the new Department will take this one on.

Fourth, much farther afield, does the Fund represent a general model for modest governmental investments in innovation and reform in different sectors? Would its "bubble up," responsive approach apply to energy conservation, health care delivery, or urban mass transit? Is the approach limited to sectors in which the government has only an indirect relationship to matters of quality and content, as in education, or would it also apply to improving the local delivery of welfare services or youth employment programs?

Thus far, the discussion has been limited to sectors and program purposes, the missions of government. A second set of possible applications are more organizational, relating to governmental structure and process (although there may be some implications for private philanthropic organizations as well).

As the Fund has developed a somewhat distinctive program strategy over the years, it has also evolved differently as an organization. In particular, one can point to:

- relative obscurity and small size at the outset, enabling it to develop quietly;
- a degree of autonomy which permitted it to exercise somewhat greater responsibility for its own affairs;
- broad consultation and advice from the field and lay public on program directions and grants;
- review procedures and criteria that stress qualitative rather than quantitative measures;
- as a corollary to reliance on the local level for the generation of proposals, major responsibilities at the staff level for proposal review and selection;
- professional staff conversant with issues and conditions in the field, and viewing themselves as educators as well as government employees;
- staff roles that are importantly generalist, engaging a wide range of areas and tasks, in addition to whatever specialization individuals bring;
- a structure that is relatively non-hierarchical, permitting group approaches to many tasks, including proposal selection.

All of these characteristics have had practical implications for the Fund, not all of which are happy. A degree of eternal vigilance is required within the larger organization which, in response to crises, is prone to mandate uniform regulations and procedures. Minor examples: it is difficult to explain to personnel officers why a generalist role and position description is preferred to that of a specialist; and to contract officers why all judgments on a proposal cannot be intelligently reduced to a mean score or rating. We can rely on the surrounding organization for fewer services, and due to our small size, some essential tasks, such as informing Congress of our accomplishments, or getting involved in other important efforts around the government, frankly have gotten too little attention. During

the week of the AAHE conference, for instance, our staff of 12 professionals was involved in activities related to reauthorization and appropriations, and at the same time was making final decisions on 1,750 proposals.

However, and I might finish with this thought, implementation of the Fund was a relatively happy and even rational affair, by any standard. The Fund was permitted, or sometimes managed to wrestle away, a small degree of self-determination which enabled it to develop according to the mission given it by the Congress and to the nature of the field it was supposed to serve. The distinctive features of the Fund's strategy, procedures, personnel, and structure discussed in this paper were developed over time in order to more fully implement the mission of supporting learner-centered improvements in postsecondary education.

Such an evolution for a program unit within the government is, unfortunately, all too unique. Typically, newly legislated programs and activities are "fit" into existing modes of operation and behavior, with too little regard for the distinctive requirements, needs, or potential benefits that call for appropriate respect and nurturance. Nor is this done as a result of explicit policy; it just seems to turn out that way all too often.

Perhaps the lesson from the FIPSE experience most worth exporting, then, is *not* to adopt our strategies and procedures; but, rather, to enable programs to develop those strategies and procedures that will allow them to better carry out *their* jobs. For this to happen, federal programs must be viewed and treated a bit like local projects: nurtured and judged according to precept, not procedure; according to standards of quality and appropriateness, rather than conformance to existing structures and rules. I have worked in government long enough to know the problems that must be overcome, and the changes that would be required, to genuinely move the larger beast in that direction. But that's the next chapter.

Commentary

Charles Bingman

Charles Bunting's article describes with some pride a federal program which he and his associates have brought into being and which they regard as a success. Apparently, evaluators of the program agree.

What FIPSE does and how it evolved is, to me, a heartening story in itself, and I believe there are some lessons to be learned by other federal grant program administrators. I would like to comment on just a few of them.

FIPSE emphasizes the basic policy of permitting local determination in identifying priorities, analyzing problems, and implementing solutions. This is a fundamental issue in setting federal grant policies—"Whose imperatives are to be satisfied?" This sort of question has been at the heart of some of the most serious public debates of the last two decades. Generally, the view of the Congress has been that national imperatives should predominate, and that federal grant

Charles Bingman is executive director of the President's Management Improvement Council, U.S. Office of Personnel Management.

policies and processes should be designed to exert that control. An essential characteristic of this concept is that "Washington knows best." But one of our hardest grantsmanship lessons has been that, even where a general federal policy has been correct, when the broad approach is carried down into specific grant determinations, the federal bureaucracy simply cannot be wiser than the thousands of local institutions and political entities with which they deal.

What is feasible or can be done successfully will rest far more on local energy and capability than on happiness in Washington. The federal program manager has an obligation to see that federal funds are judiciously placed to achieve the purposes for which they were appropriated, but it is both bolder and less corrosive for federal officials to resist the temptation to impose their own solutions on the affairs of the local recipients.

The urge to intervene is both a political and a bureaucratic urge. Politicians want to compel certain outcomes; bureaucrats want to protect their "investments" and their own flanks. The FIPSE experience may help to demonstrate that federal program managers can "trust" local administrators; that heavy-handed control by the feds is not a necessary condition of success.

A second significant policy lesson stemming from the FIPSE experience can be characterized by posing the question "Why should there be a FIPSE program at all? If there is a valuable agenda of innovation in postsecondary education, why is it not taken up and implemented locally without federal involvement?" This too is a question of general concern. Many kinds of institutions find it difficult to innovate, or to sustain funds in tight budgets for activities that are future oriented. Also many institutions—particularly public institutions—find it difficult to change from the inside. FIPSE has a separate pot of innovation money which is protected from the usual heavy pressures exerted by operating cost needs. In many public programs at the local level it is proving increasingly difficult to resist these operating budget pressures and protect funds for innovation, research, or institutional change. The federal government, which stands somewhat more remote from these immediate pressures, may have to play an increasing role in the development of deliberate strategies for financing innovation and institutional change.

I also found it extremely interesting that FIPSE was able to view the "learner" as its client, and not simply school systems. In my own experience as deputy administrator of the Urban Mass Transportation Administration, I found that we had such a preoccupation with large transit operators that we often ignored our true clients—individual people who needed better public transportation. In concentrating on the large urban bus and rail rapid transit service, people's needs in suburbs or in small towns and rural areas were long neglected. Often a city-sponsored car pool or van pool program could have been of greater value in moving people than a few more expensive buses.

Few public institutions have real competitors. I suspect more federal programs could benefit by seeking out alternative providers of needed public services.

Finally, FIPSE is unusual in that it is a discretionary program, where public funds are deployed based on the professional judgments of federal officials. Congress clearly does not care for this model. It generally seeks to control the deployment of funds itself whether by formula, definitions of eligibility, or explicit designation. Yet I think that there is much value in discretionary federal financing where, by mutual agreement, federal and local officials can precisely target funds on activities of greatest need or promise. I think this has proved to be feasible in UMTA discretionary capital improvement programs, and in HUD urban development and EDA economic development funding as well. FIPSE looks like another example of successful discretionary decision-making.

Commentary

Sol Pelavin

Since October 1978, NTS Research Corporation has been conducting an evaluation of the Fund for the Improvement of Postsecondary Education for the Office of the Assistant Secretary for Planning and Evaluation in the Department of Health, Education, and Welfare. Our evaluation of FIPSE is presently scheduled for completion in September 1980. There are still major tasks to be finished, including a large telephone survey of members of the postsecondary education community. Tasks already completed include: a review and analysis of a sample of almost 3,000 proposals submitted to FIPSE from 1973 through 1978; case studies of a sample of approximately 50 FIPSE projects; and extensive interviews with over 90 percent of FIPSE's grantees.

Many of the evaluation's early findings are summarized in Mr. Bunting's paper. Other findings worthy of note include:

- FIPSE has been successful at communicating its mission to virtually all areas of postsecondary education.
- Almost 75 percent of FIPSE's projects contribute significantly to improving the climate for innovation within the institution.
- Twenty-five percent of FIPSE's projects substantially contributed to changing their institution's mission.
- FIPSE is an unusually successful federal agency.

My response to the Bunting paper will begin with comments on three of his major points: the differences between the traditional approach to research and development and FIPSE's, practical applications of FIPSE's strategies, and FIPSE's strategies and procedures as a model for other federal agencies. Finally I will comment on FIPSE's overall success.

Traditional approaches and FIPSE's

Bunting lists several important differences between the traditional approach to research and development and FIPSE's. I would like to note that FIPSE does not support research; our evaluation found that just seven percent of FIPSE's projects were primarily oriented toward research. FIPSE supports development of solutions to local postsecondary education problems and innovations that could improve the general state of postsecondary education. Therefore I feel the contrasts would better be characterized as being traditional approaches to "development and improvement" (which Bunting refers to as "improvement" programs) and FIPSE's.

Bunting's list omits two differences that I believe significantly contribute to one of FIPSE's most notable successes: its high rate of project continuation and institutionalization. These differences are FIPSE's strategy of critical intervention and its requirement for early planning for project continuation and institutionalization.

Sol Pelavin is vice president of NTS Research Corporation, Durham, North Carolina.

A strategy of critical intervention. FIPSE uses a strategy of critical intervention; that is, it provides support at a time that is critical for project survival and success. This strategy frequently allows a relatively small financial contribution to have important significance. Moreover, FIPSE's use of critical intervention requires that it only support ideas or activities whose local development has already begun. Thus, FIPSE generally avoids supporting applicants who are merely looking for an opportunity to obtain federal money rather than attempting to fill local needs.

The critical intervention strategy also allows the Fund to use its grants to provide "moral support" to activities during periods of difficulty. The grant enables an activity to continue by providing it with a sense of legitimacy which can, in turn, be used to leverage other support from both within and outside the host institution. In essence, the critical intervention strategy is used to provide a project with an extra push after which it can continue on its momentum.

FIPSE's project at the autonomous downtown campus of Miami-Dade Community College provides an example of the usefulness of the critical intervention strategy to project growth and continuation. An existing college program, "Life Lab," was in dire need of additional resources to develop an adequate support system to accommodate a constantly increasing program participation rate. FIPSE provided the program with the resources needed to develop such a system. Since FIPSE's grant began, "Life Lab" has increased its enrollment from 80 to 600 students (approximately 5 percent of the student body). Without FIPSE's resources the support system would probably not have developed, and the program would not have been able to grow.

Early planning. Berman and McLaughlin (1977) found that educational projects were more likely to become institutionalized when continuation strategies were considered early in the project's development. FIPSE emphasizes that proposals should include a plan for the project becoming self-supporting or for obtaining support from the host institution. The agency also stresses not only that the host institution may be asked to contribute some support to the project, but also that the proportion of support from FIPSE will diminish if a project award extends beyond one year. Our evaluation found that the proposal selection process reflected these emphases, and we believe these emphases have indeed contributed significantly to FIPSE's high rates of continuation and institutionalization.

Practical applications of FIPSE's strategies

In his paper, Bunting asks "would elementary and secondary education benefit from a modestly-funded improvement program paralleling the Fund, although with differing strategies, given this sector's different structures and cultures?" He implies that the answer to this question is yes, but he gives no concrete suggestions. I believe several FIPSE-type programs could be successful; there is clear need for "Funds" to improve elementary and secondary schools.

More importantly, however, are the needs for innovative improvements in federal categorical programs, especially those which are formula-funded entitlements. For example, a Compensatory Education Fund for the Improvement of Title I of the Elementary and Secondary Education Act would enable local practitioners to have support for new compensatory education strategies. The new projects would not initially replace a local school district's compensatory education program but rather, would allow the district to try, in a limited setting, innovative solutions to needs not currently being met. If the solutions are successful, then the project's activities would become institutionalized, probably as part of the district's compensatory education program.

FIPSE's strategies could also be applied to problems of desegregation or bilingual education. In fact, the Education Amendments of 1978, incorporate the goal of building local capacity to deliver bilingual education.

FIPSE as a model for other federal agencies

I strongly disagree with Bunting's conclusion, "Perhaps the lesson from the FIPSE experience most worth exporting, then, is *not* to adopt our strategies and procedures, but, rather, to enable programs to develop those strategies and procedures that will allow them to better carry out *their* jobs." I feel that some of FIPSE's strategies and procedures should be explicitly adopted by other federal agencies. For example, FIPSE's grant review procedures are exceptional.

FIPSE has developed a two-stage process for reviewing grant proposals. The first stage or "preliminary" proposal typically is short (approximately five pages) and includes a brief definition of the problem to be addressed and a description of the project's activities and anticipated outcomes. Preliminary proposals are initially reviewed by readers from the postsecondary education community. Since the number of preliminary proposals to be reviewed ranges from 1,500 to 2,000, the readers participating in the initial review number approximately 150. Groups of reviewers are annually convened in four or five locations across the country. Proposals are ranked according to several criteria; rankings together with readers' comments and the proposals themselves are next reviewed by small committees of the staff. FIPSE then requests that about 350 of the applicants submit an enlarged and more detailed second-stage or "full" proposal.

Full proposals are initially reviewed by a select panel of three readers: one reader from the general field of postsecondary education, one from the specific area of postsecondary education addressed by the proposal, and one from the FIPSE staff. The full proposals, together with panel's comments, are then reviewed by the staff. If there is strong disagreement about the proposal's merits, an additional review may be conducted by a staff committee. Otherwise, either a final decision is reached or the full proposal is submitted to FIPSE's Board of Advisors for their review. The Board most frequently reviews proposals requesting large amounts of support or those that might be considered controversial or unusually significant. After the Board submits its recommendations, final decisions are made.

The use of a short preliminary proposal stage allows small groups with limited budgets to compete against larger, more established organizations, thereby encouraging broad-based competition. Furthermore, FIPSE's process ensures that each proposal receives meticulous review and that only those applicants whose merit is most clearly demonstrated are awarded grants.

The National Institute for Education has recently successfully adopted a similar two-stage grant review process. I believe other federal agencies attempting to foster local change and improvement would also find such a process extremely beneficial in helping them select the most worthy grantees.

FIPSE's success

The unique achievements of FIPSE as a federal agency promoting change are not accidental. To a substantial degree, I believe, FIPSE's management activities and philosophy underlie the agency's overall success. FIPSE's unique staff and director should be given proper credit for their role in the agency's success and should be congratulated for a job well done.

In conclusion, I believe that lessons learned from FIPSE's success should be valuable to all those who are concerned with change and improvement.

Commentary

Kenneth W. Tolo

I am pleased to have this opportunity to respond to Mr. Bunting's paper assessing the strategy and structure of the Fund for the Improvement of Postsecondary Education and their potential application to programmatic efforts beyond postsecondary education.

An institutional perspective

In brief, institutions of postsecondary education love the Fund. Unlike many federal government grant programs, the Fund rewards local initiative and focuses on locally perceived problems. This local orientation, in turn, creates an institutional commitment to its proposed programs, through the process of identifying the problem, analyzing possible solutions, implementing necessary actions, and continuing funding from alternative sources after Fund grants expire. These institutions have shown themselves willing and able to plan and to effect change when given an opportunity to do so by the Fund, a program unencumbered by restrictive federal guidelines.

The responsiveness, interest, and knowledge of the Fund's program officers also are viewed very favorably by institutions of postsecondary education. Program staff give attention to new and practical ideas. Each proposal for funding is judged on its own merits, not simply on the basis of quantitative measures such as the number of publications of the principal investigator.

The Fund limits its funding commitment to each project, thereby ensuring that several new program proposals and previously unfunded principal investigators receive funds each year. Practitioners thus view the competition as open; each one believes there is an opportunity for funding.

Factors affecting applications of the Fund's structure and strategy

Three types of factors will have an important influence on the application of the Fund's structure and strategy to other government agencies and programs. First, institutions of postsecondary education possess several characteristics that may not be present in other institutions and agencies. Project directors in these educational institutions have great flexibility to initiate and propose a wide range of projects. The educational interests and roles of university faculty and administrators, for example, are generally less restricted than those of staff in other settings, including elementary and secondary education. In short, there is less legislated uniformity in colleges and universities than elsewhere.

Second, the Fund's structural and procedural characteristics also are important. The Fund has a young, small, non-hierarchical staff of generalists who know the current substantive issues in postsecondary education and who work together well. The staff is not divided among several categorical programs; rather,

Kenneth W. Tolo is associate vice president for academic affairs and professor at the LBJ School of Public Affairs, The University of Texas, Austin.

the Fund's funding decisions are made collectively. The characteristics of Fund proposal reviewers also differ from those of most reviewers. Practitioners are included as reviewers; publications are not a required qualification. There is an unusual collegiality and sense of community among the directors of Fund projects, as illustrated by their annual meetings and networks.

Finally, other government agencies and programs, often are restricted to a greater extent than the Fund by congressional mandates incorporated into authorization or appropriation measures. Individuals, not ideas, generally are funded. Because proposal reviewers often are selected on the basis of their research and publications, there is a "balkanization" of reviewers, each assigned to one narrow speciality. Most programs, unlike those of the Fund, are filled with constraints and criteria that "clarify" the program's objectives.

Potential problems of expansion and application

I am hopeful, yet uneasy, about the suggestions to broaden the Fund's program activities and to apply the Fund's strategy and structure to other government programs. One key to the Fund's achievements has been its singleness of purpose. Careless program expansion and too much attention to its "successes" will spoil the Fund. On the other hand, lack of change can be no better for the Fund than expansion. Change is necessary, if it is deliberate and planned and if it does not set aside the basic characteristics of the Fund and its program—including the responsibility for local initiatives. In considering whether the Fund should broaden its program responsibility, we need to remember that the Fund supports changes, not programs. The Fund cannot afford to become so intrigued by expansion that it loses sight of its mission.

Efforts to apply the Fund's organizational and procedural approach to other federal education offices and agencies should be undertaken with care. Even though another postsecondary education office may have the same constituencies as the Fund, it would be difficult to impose a new Fund-like organizational arrangement on it. Even for the new Department of Education to adopt Fund approaches in its other postsecondary education offices would be almost impossible in view of traditional practices. Further problems exist at the elementary/secondary education level, where staff often are less flexible.

The application of Fund principles and procedures to other federal agencies not responsible for education also is impossible when these agencies are more concerned about maintaining the status quo or about extending basic knowledge than about application-centered research (for example, the National Science Foundation, the Office of Naval Research, and the National Institutes of Health). Nor is the existence of a problem focus sufficient to ensure the successful application of the Fund's approach, as evidenced by the efforts to cure cancer and make fusion power a viable energy alternative. On this point, I agree with Bunting in removing from consideration for the application of the Fund's strategy and structure all basic research and regulatory agencies.

I do not want to avoid changes in the Fund. Nor do I want to reject all potential applications of the Fund's approach to other programs. Rather, I am concerned that the considerable attention—almost all favorable—directed to the Fund recently will (1) create unreasonable expectations of the Fund, thereby increasing pressure to make changes for their own sake; and (2) lead a wide range of government agencies to develop program strategies and structures inconsistent with their missions, simply because these strategies and structures worked in one place.

Thus, while I endorse the possible decision by the President's Management

Improvement Council to prepare a case study that presents the Fund's strategy and structure as a model approach, nevertheless this federal government initiative does not lessen the concerns I have expressed.

Proliferation and Agency Effectiveness in Accreditation: An Institutional Bill of Rights

H. R. Kells

In the last ten years, process and practice in accreditation have improved dramatically. Early in the decade, pointed criticism from individuals and from reform commissions spurred the accreditation community to conduct self-analysis and to begin a slowly developing but discernible set of improvements. At the national level, mechanisms for approval and coordination of accrediting agencies were greatly strengthened. Working relationships with state agencies were also improved. Within the accrediting agencies, training programs for evaluators, research on the process, interaction among staff members of various agencies, general staffing levels and expertise, and clarity and usefulness of policies and standards all seem to have increased, if not improved greatly. Finally, there has been a much-welcomed focus on the improvement of self-study processes, the heart of the accreditation activity (1,2).

But all is not set and settled in the accreditation world as the 1980's begin. Reform commissions still warn of relying too heavily on the process as it is presently conducted (3). The federal government role and the corresponding role of the states continue to receive much attention. And the voices of the institutions themselves are beginning to be heard as they attempt to weigh the benefits of accreditation against its costs (4). It is the latter phenomenon which will be the subject of this presentation—specifically, the interaction of institutions with the accrediting agencies, the areas needing improvement, and the presentation of a reasonable set of expectations in this regard: a statement of institutional rights in accreditation.

Institutions and accrediting agencies: an overview

If one examines the interface between postsecondary institutions or programs and the accrediting agencies with which they relate, a complex series of contradictions, ironies, and concerns are encountered, and they form the context for any set of proposals to improve the system.

A most confusing love-hate relationship seems to exist between institutions and their accrediting agencies—one has to say "their" because, theoretically at least, the institutional accrediting agencies and to some extent the specialized accrediting agencies as well are creatures of the institutions. They were created by

H. R. Kells is professor of higher education and information studies at Rutgers University. He is former associate director of the Middle States Commission on Higher Education. The author acknowledges with gratitude the leave provided by Rutgers University during which this paper was prepared, the small grant provided by the Rutgers Research Foundation, and the work of Eleanor Kells, who prepared the manuscript.

the institutions and/or institutionally-based professionals control them. This is, of course, not inconsistent with the development within the agencies of a definite life of their own accompanied by elements of positional and often personal power, often directed at the institutions that created them. This seeming contradiction appears to be one of the great strengths of the system. Such an insitutionally created power of self-policing, *if effectively and sensitively used* is a great asset—an asset not possessed by any other educational system in the world. Elsewhere, inflexible government control and uniformity hold sway. The key question, it seems to me, is the extent to which the accrediting system is effectively and sensitively employed. The remaining contradictions, ironies, and problems begin to emerge as one examines these dimensions.

The first contradictions have to do with knowledge and motivation. Although we are just beginning to explore this issue systematically (5), probably very few people at postsecondary institutions are knowledgeable about the purpose, procedures, potentials, people, and general activities of the agencies. And even that level of knowledge, either ebbs and flows with the closeness of periodic review or other contact, or is probably related to the extent of inclusion of such individuals in agency activities. Those included in the process are a relatively low proportion of the professionals.

Secondly, the motivations to seek accreditation for a given program or institution are varied and probably differ dramatically among the top-level executive officer, the program head, and the instructor on the firing line. If knowledge is generally low and motivation varies greatly, then it is not surprising that the fortunes of accrediting agencies appear to rise and fall dramatically, and that fair-weather friendship or friendship between an agency and *individuals* within institutions is the rule. It also explains the relatively high level of rumor, myth, and fear encountered concernng the accrediting process.

The situation is even more complicated. Postsecondary institutions are under strong economic and political pressures in this era, which tend to reinforce any negative attitudes about "external" agencies. One must also remember that most of our students, faculty members, and administrators work at large, complex institutions where information flow is impeded, systematic study and planning are often difficult and expensive, and strong internal political forces are often at work. For an accrediting agency to be well understood and to function effectively and sensitively is most difficult. Such people-oriented processes seeking to assist and to evaluate, therefore, often start at a substantial disadvantage under these circumstances.

Finally, a set of additional conditions form part of the context for any reform proposals:

1. There exist two contra-directed movements within the institution-agency interface. On the one hand, representatives of additional disciplines continue to formulate proposals for new accrediting agencies. At the same time, institutions, particularly large and more prestigious ones, are beginning to discard accrediting relationships. One of the ironies is that some of this appears to be happening in a field (teacher education) where the job market for graduates is a problem—almost as if the seal of accreditation is no longer seen as an important advantage to job hunters.

2. It is quite clear that at least the chief executive officers and the informed, relatively experienced minority of other professionals at institutions who have had recent contact with accrediting agencies report repeatedly that accreditation and particularly the self-study aspect are useful and worth the time and money involved

(2,6,7). At the same time, more and more institutions are speaking out against duplication of effort in accrediting and proliferation of accrediting agencies, particularly in multiple accrediting relationships for a single institution (4,8). Some are also rebelling against unreasonable and/or arbitrary accreditation standards (9).

3. Institutions indirectly support national coordinating bodies through the dues they pay to accrediting agencies. The most prominent body is the Council on Postsecondary Accreditation (COPA), but funds also go to the Council of Specialized Agencies and the less formal group of regional agency executive officers. Although COPA was born rather recently of a merger of two agencies and although it has been trying to develop a set of policies for agencies and has a stated concern about proliferation and duplication in accrediting, little if any policing of agencies actually goes on. There has been as yet no thorough review of agency functioning by COPA and little progress has been made toward eliminating duplication in accreditation. Since COPA was formed of two very different types of accrediting interests and since its relatively small staff has been occupied largely with fending off federal initiatives in the accrediting world, it is not surprising that progress has been slow. Some agencies, however, have begun to send staff members to visit and become familiar with the activities of other agencies, and COPA has sponsored conferences with work-groups on agency cooperation (8). Some agencies have formulated cooperative agreements on self-study requirements and joint or concurrent team visits (10). But progress is slow and cooperative activity is minimal. Furthermore, some agency executives are openly opposed to any interagency cooperation. Others report that their "hands are tied."

Within this complex and difficult context, and acknowledging that many institutions report no problems with accrediting, there do seem to be a series of problems which from the institutional perspective require some policy direction and some action. As I see it they are as follows:

Regarding proliferation and duplication—

1. There appear to be too many accrediting agencies. There are 45 to 60 depending on how one counts. There is enough subject-matter overlap between some agencies that a given school at some universities must deal with two or three different agencies. Not only should no new agencies be created, but the number of existing agencies must be reduced via merger or elimination. It is time for COPA to be more vigorous and active here.

2. There is not enough coordination and cooperation between the agencies at the interface with the institution. Only ten percent of the regionally accredited institutions have five or more accrediting relationships, but some have more than 20. For smaller, less well staffed institutions two or three such relationships may be a burden under present practices. Over 40% of the institutions have two or three relationships (11). A recent study showed clearly that three out of four institution presidents feel that there is duplication in accreditation efforts, and that most would welcome greater cooperation in accreditation (12).

The answer to this problem is an administrative one. It requires the designation of one agency per institution (with the institution choosing the agency) as the coordinating agency for the institution. That agency would be the coordinator for self-study, team construction, and team visit scheduling. It is one thing for agency executives interested in more cooperation to say that the institution about to be evaluated should stand up to several agencies and demand

cooperation. It is quiet another for institutions to do so. For a few strong institutions this tactic works, but for most the agencies don't cooperate and thus demand individual access to the chief executive officer and any program head. One northeastern university was recently visited 40 times in three years. One may appropriately ask, how can institutions stand up to this, if COPA policies don't *require* coordination and protect institutional rights?

3. Too many reports, so-called "self-studies," and true self-study attempts are requested by accrediting agencies. The institution's own self-study and planning schedule must be the primary concern. At this point, most accrediting agencies don't recognize this. When this cycle is weak or embryonic, it must be enhanced. Confounded multiple accrediting requirements do not help this, they hinder it. The quality of study and general management at our institutions would improve if an articulated series of agency requests could reinforce and be part of the institution's own cycle. Regional accrediting agencies should use this cycle, help improve it, and not divert an institution from it. Specialized or program accrediting agencies should make their self-study requirements fit into an institution's cycle. The coordinating accrediting agency would have a role to play in this effort. No institution should have to conduct more than one large institution-wide, participatory self-study exercise and one follow-up planning exercise in any five-year period. Of course, minor letter-type reports may be necessary concerning local actions taken and could be required.

This general scheme should be carefully articulated with statewide planning efforts. We must reduce the total reporting burden dramatically if true study and effective planning are to occur. Staff members overwhelmed by reporting requirements cannot be expected to study and develop their programs well and to prepare effective materials.

An example of the type of ridiculous duplication currently encountered is the requirement by many agencies that the self-study report contain copies of all faculty resumes, often in an agency-specific style. This should be eliminated totally. The agency team members can peruse the one normal set of resumes maintained at the institution. This kind of duplication occurs in dozens of specific agency requirements—forms, data needs, definitions. It must be dramatically curtailed.

4. The schedule of visits must be coordinated and controlled to prevent major interferences with the primary work of the institution. Clearly some institutions do not mind separate visits over a two-to-five-year period by several agencies. But the right of an institution to secure joint or concurrent accrediting team visits must be established by COPA policy. The agencies should not be permitted to refuse to schedule joint team visits. Secondly, the frequency of visits for many agencies must be reduced and made uniform, or at least coordinated for a given institution. Unless special problems are present with respect to a given institution (and can be documented to COPA, if necessary), the accrediting agencies should adopt a five- or ten-year schedule for regular visits and this should be coordinated for the institutions by the designated coordinating agency. If disagreements arise that cannot be settled by the institution and the coordinating agency, COPA should settle the matter, perhaps using trained mediators.

Regarding agency effectiveness—

1. Accrediting agencies must validate their standards. It is one thing for an agency to evaluate an institution on the bases of, first, the extent to which the organization seems to be achieving its clearly stated, appropriate goals and second,

the extent to which it seems to be functioning well (can survive, and can continue to achieve its goals). That approach is an accepted one for determining organizational effectiveness (13). It is quite another to employ arbitrary standards of good practice in the field as most specialized accrediting agencies do. Because the demands of these agencies (which escalate and often confound when multiple accrediting relationships occur) can sometimes divert resources and create havoc in an institution, they must be subject to validity studies. The ultimate test of predictive validity—whether the standards create effective practicing professionals—must be conducted over time. These studies require ascertaining attributes of good professional practice in a field, translating them into standards, and then testing for impact. Such studies are very expensive. Accrediting agencies in theology and law have recently embarked on such studies (14). All agencies should conduct such studies in the next ten years or they should consider departing from the accrediting scene. Institutional well-being would seem to require it.

2. All accrediting agencies must provide effective on-campus staff assistance and consultation. The need to explain standards, to assist in self-study design, to speak to the professional staff, and to otherwise translate the cold, written descriptions and standards of accrediting agencies into usable, relevant processes at the institution requires competent staff contact. An office-bound staff that sends letters and documents and offers explanations by telephone may be a major cause of less than effective and useful accreditation practice. Any agency that cannot afford to provide such service should merge its efforts with other agencies or groups so that the critical mass of staff and dollars is present to do the job for each area to be accredited. The remaining examples of what is, in effect "send me your money and an application ('self-study') and I will send you a list of standards, a visiting team and, eventually, an accreditation imprimatur" must be eliminated and no more such agencies should be permitted.

3. Evaluation team activities need some improvement. The accrediting agencies must all engage in training activities to produce competent, well prepared team members and chairpersons. The team members must be carefully selected in light of institutional characteristics and needs, and they must be unbiased (therefore not from local and/or competing institutions). The teams must be kept modest in size. Some specialized agencies send more people than the regional agency does, and often at great cost to the institution. Guidelines on training, team size, joint and concurrent team functioning, and distance (conflict of interest) must be established and enforced for all agencies.

4. Evaulation team reports must be relevant, readable, useful, timely, and objective. A oral report should be made before the team leaves concerning every major aspect to be put into the written report. The standards should be covered and the report should contain useful suggestions. It should be filed within a month of the visit.

5. Accrediting agencies must provide the rights to appear and to appeal. Most agencies do provide a due-process appeal mechanism for the occasional institution that disagrees with the process or substance of an action. Many do not, however, allow those institutions to appear before the accrediting commission or council as the team chairperson presents his or her report. They should. While it would destroy the process to release all reports and to open all deliberations, as some have suggested, it would add much to institutional understanding and it would bring the accrediting process in line in terms of due process if institutions

could comment directly during the accrediting commission process. This would not preclude executive sessions for further discussion and action, but it would improve the credibility of the process and increase knowledge about it and the accreditors.

6. COPA must start to represent the institutions directly in the accrediting process in the ways mentioned above. It should enact policies and establish mechanisms on effectiveness, review of agencies, workable coordination and any necessary appeals about coordination in order to reduce duplication of effort and costs to institutions. It should act on behalf of instiutions to improve the accrediting process and to reduce its burdens on institutions.

It is hoped that the above suggestions will be introduced to the Board of the Council on Postsecondary Accreditation after appropriate review (over the months—not years—ahead), with the support of the COPA staff and many accrediting agency executives and with the endorsement of institution heads and association offices across the postsecondary spectrum. In effect, up to this point COPA has chosen a relatively cautious posture concerning needed coordination of and cooperation among accrediting agencies. While acting to increase information about the need for such actions and while encouraging them actively, it has chosen a policy of non-interference, hoping that appropriate, acceptable cooperation would occur. I firmly believe that a more active posture is needed to improve the situation and to relieve institutions of some unnecessary burdens. There is the danger that if the accreditation community does not act to further improve its policies and procedures, some undesirable trends may accelerate to the detriment of this valuable process of self-regulation. First, without such action more of the secure, the stronger institutions may decide to abandon additional accreditation relationships. This process has begun at some major universities. Second, as we were firmly warned by the recent Sloan Commission report and other actions by state boards, government agencies are ready and willing to attempt to replace the self-regulation process. Neither of the above conditions would be beneficial to American postsecondary education.

This, then, is a call to the accrediting community to continue to exemplify self-improvement processes by adopting an Institutional Bill of Rights in Accrediting along with the enabling mechanisms discussed above.

An Institutional Bill of Rights in Accrediting

As an addendum to the COPA Code of Good Practice in accrediting, postsecondary institutions in America are assured of the following rights as they engage in the process of accreditation—

Regarding proliferation and duplication in accrediting:

1. The right to expect that the number of accrediting agencies will not be excessive, that the agencies will not be competitive or in conflict, that the disciplinary coverage in the agencies will not be duplicated, and that the number of agencies will be small enough so that each can be at a size and support level to enable adequate service to institutions, as is indicated below;

2. The right to a simple, well coordinated relationship with more than one accrediting agency, including, if desired, the designation of one agency as the

coordinating agency for a given institution, and the right to appropriate redress after appeal to COPA with regard to disagreements about the frequency and type of self-study and team visit;

3. The right to have the institution's own regular self-study and planning mechanisms and cycle be the primary focus and determinant of the nature and frequency of accreditation self-study activities. If the institution chooses to invoke it, the accreditation agencies cannot require under normal circumstances more than one regular, institution or program-wide self-study in a five-year period. If the institution chooses to employ a joint self-study process to serve more than one agency, the agencies must agree;

4. The right to select a schedule for regular, periodic accrediting visits which will be acceptable to the institution. If the institution chooses to invoke it, any agency must agree to a joint or concurrent visit, and under normal circumstances none may require more frequent, regular or periodic visits than one every five years.

Regarding effectiveness of accrediting activities—

1. The right to expect all accrediting agencies to conduct studies of the validity of their standards and to publish the results of such studies;

2. The right to expect competent, on-site staff assistance, explanation of standards and procedures, and any appropriate consultation; and that staff members will not serve as evaluators of institutions or programs;

3. The right to expect that accrediting agencies will employ, with few exceptions, only formally trained evaluation team members and chairpersons; that such visitors will be carefully selected in light of institutional characteristics and needs; that they will be competent and objective and not be biased or in conflict of interest; that the institution may submit a confidential evaluation to the agency on each visitor; and that new visitors will generally be used in any sequential visits.

4. The right to expect full, relevant, timely, objective and useful evaluation team oral and written reports;

5. The right to appear at accrediting commission sessions as the chairperson makes the team report; and the right to appeal decisions;

6. The right to expect COPA to act on behalf of institutions to control the number of accrediting agencies; to eliminate duplication; to settle disputes between agencies and conflicts between policies of different agencies; to enforce institution general wishes about schedule of visits and joint activities; and to hear appropriate appeals.

References and Notes

1. H. R. Kells, "The Reform of Regional Accreditation Agencies," *Educational Record*. Winter 1976, pp. 24-8.

2. _____. and Robert Kirkwood, "Institutional Self-Evaluation Processes," *Educational Record*, Winter 1979, pp. 24-45.

3. Sloan Commission on Government in Higher Education, Report of the Commission, *A Program for Renewed Partnership* (Cambridge, Mass.: Ballinger, 1980).

4. "The Accreditors are Coming! The Accreditors are Coming!" *The Chronicle of Higher Education,* May 22, 1978, pp. 7-8; Donald C. Brodie and Robert P. Heaney, "Need for Reform in Health Professions Accrediting," *Science,* vol. 201, August 18, 1978, pp. 589-93; and Robert Kirkwood, "Institutional Responsibilities in Accreditation," *Educational Record,* vol. 59, no. 4, Fall 1978, pp. 297-304. The remarks of President William Knisely of the Medical University of South Carolina made before the meeting of the Council on Postsecondary Accreditation on January 31, 1979, in Charleston, S.C., are typical of those made by the leaders of institutions that are accredited by more than one agency. President Knisely sharply criticized the duplication of effort inherent in and the cost of self-study processes, reporting requirements, and evaluation team units from multiple accreditation relationships. Other outspoken presidents have been those from large, land-grant, and major private universities, virtually all of which have substantial numbers of accrediting relationships per institution.

5. Richard Parrish at Rutgers University is studying these questions as part of his doctoral program. Results should be available sometime in 1981.

6. Stephen Romine, "Objectives, Objections and Options; Some Perceptions of Regional Accreditation," *North Central Association Quarterly,* Spring 1975, pp. 365-75.

7. W. Keith Warner, *Accreditation Influences on Senior Institutions of Higher Education in the Western Accrediting Region: An Assessment,* (Oakland, Cal.: Western College Association, 1977).

8. The entire program of the Winter 1979 meeting (January 31-February 2, 1979, in Charleston, S.C.) of the Council on Postsecondary Accreditation was devoted to explaining the possibilities for advancing the notion of increased cooperation among accrediting agencies. Representatives of about three-quarters of the COPA recognized agencies participated along with government, institutional, and lay observers. The conference produced several dozen suggestions and recommended steps for COPA, for agencies, and for institutions in order to produce more useful cooperation among the agencies as they work with institutions. To this writer's knowledge, no significant new COPA policies have resulted to date from this and other related activities.

9. Several articles have appeared in *The Chronicle of Higher Education* about institutional objections to specific agency standards in the field of business. Many institutions grumble silently about other often costly standards and requirements.

10. Long-standing written agreements do exist between some regional and specialized agencies. The Association of Theological Schools, for instance, has written agreements with the Middle States and Western Senior Commissions. More recently single agencies have been reaching out to other agencies. One example is the National Association of Schools of Art.

11. H. R. Kells and Richard M. Parrish. *Multiple Accreditation Relationships of Postsecondary Institutions in the United States,* Technical Report No. 1 (Washington, D.C.: Council on Postsecondary Accreditation, 1979).

12. Fred L. Pigge, *Opinions About Accreditation and Interagency Cooperation,* (Washington, D.C.: Council on Postsecondary Accreditation, 1979).

13. John P. Campbell, "On the Nature of Organizational Effectiveness," in *New Perspectives on Organizational Effectiveness,* ed. by Paul S. Goodman, Johannes M. Pennings, and associates (San Francisco: Jossey-Bass, 1977).

14. David Schuller, et al., "The Assessment of Readiness for the Practice of Professional Ministry: Rationale and Research Method," *Theological Education,* Fall 1973, pp. 48-65; and David Schuller, et al., *Readiness for Ministry,* Vol. I and II (Vandalia, Ohio: American Association of Independent Schools, 1975, 1976).

Commentary

Robert L. Ketter

It is ironic that on the day I began this response to Dr. Kells' paper the June 16 issue of *The Chronicle of Higher Education* crossed my desk with a lead story which raises a question about whether the Council on Postsecondary Accreditation will survive the debate and political in-fighting over self-regulation as opposed to governmental regulation. I reacted to this story with some dismay and frustration, for as the president of a public university that must deal with about 18 different accrediting bodies in addition to the New York State Education Department, I have long been aware of the need for a coordinating body such as COPA. In fact, I have advocated for a number of years that the organization should be strengthened.

Kells' paper presents an accurate and comprehensive summary of the problems that confront institutions in the present system of accreditation; and these problems supply ample rationale for the strengthened body we both advocate. Of course, some institutions have taken steps to deal with the problems on their own, in ways other than discarding accrediting relationships, while simultaneously encouraging a stronger COPA. For instance, the State University of New York at Buffalo invited a number of specialized accreditation bodies to coordinate their visitations with that of the Middle States Association of Colleges and Secondary Schools when we underwent an institutional accreditation in 1972. The advantages hoped for by the university in this approach were that the comprehensive institutional view sought by Middle States would place in perspective the parochialism of the more specialized bodies, and that a multiple accreditation process would be telescoped into a less costly and time-consuming framework. There were also advantages to be considered for the accrediting groups; namely, the notion of the necessity for cooperation and coordination and an opportunity to exercise a broader view of the role of a specific unit within the university.

Not all of the specialized accreditation groups responded favorably to the university's invitation to coordinate their visitations in this experimental forerunner of the type of activity that could be conducted under the auspices of an organization such as COPA. However, five groups did accept and participated with the Middle States team and representatives from the New York State Education Department and Brookings Institution. The result, from my own perspective, was that the joint visitations seemed to have at least a tempering effect on groups that might otherwise have pressed their parochial interests and demands with more immediacy. Moreover, the venture eliminated a great deal of duplication and saved both time and expense. It responded directly, therefore, to most of the problems Kells has identified from the institutional view.

More recently, the Central Administration of the State University of New York has taken steps to eliminate a major redundancy in study and paperwork created by accreditation and state legal requirements. By state law, every public and private institution of higher education in New York must submit to the Board of Regents a five-year master planning document. In the current cycle, the State

Robert L. Ketter is president of the State University of New York at Buffalo.

University has submitted a master plan for the *system* that was drafted within Central Administration. Individual campuses—which previously had to submit their own master plans to the Central Administration—have been allowed to use the self-study documents prepared in anticipation of a Middle States visitation as the basis for their master plan. In addition to eliminating a great deal of redundancy, this should impart added substance to both the self-study and the master plan.

The necessity of taking such steps as those described above is indicative of the level of frustration that many institutions experience under the current unwieldly system of accreditation. Presently, there is a willingness to take such steps while also seeking a more permanent arrangement under the auspices of an umbrella organization such as COPA. That arrangement, however, can only be accomplished with the cooperation of the accrediting agencies and not through the efforts solely of our institutions. Kells emphasizes this fact and points to a number of steps that agencies can take to improve their own effectiveness.

If this cooperation does not occur, I believe it is entirely possible that institutions, out of frustration, may begin to pull back from the process of voluntary accreditation. Indeed, Kells points out that this has begun at some institutions. A trend of this sort invites the government to assume responsibility for the process; and although Kells notes such a possibility, I would have preferred a greater emphasis upon it.

In New York State, the State Education Department (SED) has the legal authority to register and de-register all programs of instruction. I believe the attitude of that department toward the accrediting agencies—certainly the perceived attitude—is that they are merely a secondary factor and that their existence is simply tolerated for the moment. In the actual political process, the threat of loss of accreditation has never in itself been enough to pry loose funds from the state for public institutions. The government reaction on more than one occasion has been: "So what. You don't need it as long as you have SED approval."

If our institutions and their accrediting agencies do not find a pathway toward cooperation and an improved accreditation process, I fear the reaction of more and more persons will become: "So what. The government can do it." Such a development, whether at the federal or state level, would be very much more restrictive of institutional self-determination than voluntary accreditation has been or ever will be. For that reason I strongly support the "Institutional Bill of Rights in Accrediting" that Kells has proposed. It is grounded in something that academicians have always been accused of lacking: common sense. It is high time, therefore, that we used a lot of this for our own good.

Commentary

William H. Knisely

Dr. Kells' statement that both the process and practice in accreditation have improved dramatically in the past ten years is correct. Unfortunately, however, the number of agencies carrying out accreditation seems to have increased even more dramatically as seen from the viewpoint of academic institutions. In this insti-

William H. Knisely is president of the Medical University of South Carolina.

tution, charged with the limited role of health professions education, the proliferation has intruded deeply into the efforts to carry out the very academic purposes for which the institution exists. A table illustrating relative demands on the time of academic staff is found in *The Academic Man*.[1] Perhaps the health professions are a major area in which the proliferation has occurred.

Let me first strongly support the need for continued voluntary, non-governmental accreditation to obtain and retain the advantages of unfettered higher education; particularly, the theoretical and actual advantages of diversity in higher education. The importance of diversity is discussed in the excellent little volume entitled *Constraint and Variety in American Education* by David Riesman.[2] As Kells indicates, the proliferation of accrediting agencies is now forcing us to weigh the values of the present processes of accreditation against their costs. We hope to retain the benefits while reducing the costs and Kells' suggestions for moving in this direction are excellent. In the book *Governance of Colleges and Universities,* Corson refers to ". . . more than forty professional associations . . ." as a network of accrediting associations with which a single institution must interact.[3]

The fact that few people at postsecondary institutions really know and understand the "purpose, procedures, potentials, the people and in general the activities" of the accrediting agencies must be corrected by the institutions. The knowledge gained will help accomplish the purposes of accreditation. It will indeed reduce the differences among the motivations of chief executive officers, program heads, and faculty. The movements referred to as "contra-directed" are caused by the increasing number of accreditations. Obviously, as yet more disciplines arrive to accredit, the institution heads take one of the actions open to reduce their interference; namely, they move against all accreditation activity.

I concur with the point made that the major value in accreditation is the self-study. I concur with the suggestion that the Council on Postsecondary Accreditation should take onto itself actions to correct the current proliferation and associated costs. It should start now. It should be of concern that a one-third differential could exist in the "known" number of accrediting agencies (from 45 up to 60)! This in itself is enough to indict the current processes as being less than optimal. The suggestions made for reducing the number, providing for cooperation and coordination, and the important recommendation that a single coordinating agency be established for each institution would facilitate these previous suggestions.

The comment that no institution should have to conduct more than one large institution-wide participatory self-study exercise and one related following planning exercise in a five-year period is concurred in. However, logical extension is to ask: "Why, if the total institution is accredited, should any of the parts of the institution then be accredited separately?" Are the regional overall institutional procedures inadequate? Do certain disciplines require such expertise that they must be evaluated by individuals from that discipline? If this be the case, professionals from that discipline should be able to explicate what it is that they have learned while becoming members of the discipline that cannot be known by others who have not been so educated. The point I am making is that not only should no institution be required to carry out more than one major self-study accreditation procedure in five years, but that absolutely no more at all should be required unless deficiencies are recognized or a new program is started or some similar justifiable reason.

In my judgment, a single accreditation, "massive" if necessary, makes more sense than the repetitive arrival of one group after another, again and again. The several groups could easily reconcile the academic, fiscal, and administrative data

of relevance regarding historical information, students, library, budget, faculty, projected estimates for the future, etc., rather than to continue filling out slightly different forms seeking basically the same data.

Clearly, the suggestions relating to accrediting agencies must be implemented simultaneously—validation of standards, effective on-campus staff assistance and consultation, the evaluation of the teams' activities, and the provision of training by the accrediting agency. Reports should indeed be made orally before the team leaves, and a rapid, readable, and objective report should follow soon thereafter. Also, the rights to appear and appeal must be included. The need for COPA to represent the institutions in the accrediting process is crucial.

The Institutional Bill of Rights is clear and should be a useful instrument in accomplishing the stated purposes.

In the health professions, aspects of accreditation are obvious to me that have not been mentioned. These relate to some of the reasons for proliferation in these areas. Accreditation has become a major status symbol. This is so because medicine, which is at the head of this hierarchy, and then the major groups that followed—pharmacy, nursing, and dentistry—control their own accrediting. I have urged for some time that medicine and dentistry should cooperate in carrying out a single accreditation visit at the approximately 50 institutions in which both medicine and dentistry are located. I have also urged that they offer to nursing and pharmacy that they join them in these 50 institutions. Efforts to coerce the allied health professions to be accredited together should stop until medicine and dentistry have provided their important potential example. In the absence of such action by medicine, dentistry, nursing, and pharmacy, new health programs will simply continue to follow the accreditation process towards status and recognition as "professions."

One modification I would suggest to Kells and his readers is that perhaps six years would be a better basic number than five, because if a shorter duration revisit for a particular program is required, then the divisibility of six into one's, two's and three's would permit a regularized but shorter time frame within the overall six-year period.

I would emphasize both as an example and as an independent recommendation that hospital accreditation, which now occurs each two years, makes good sense and should continue at two- or perhaps three-year intervals because the health of patients depends upon the currentness of meeting codes in all building systems and in all aspects of the delivery of care and in the maintenance of all record systems. It is conceivable that a similar shorter time frame than six years might be agreed upon for other programs. If so, I would then suggest that they occur on the two- or three-year pattern. Thus, hospital and any other special accreditations could fit into the six-year program for the major general accreditation visits by the regional agencies at each six-year interval.

Kells has suggested several ways to get on with putting our own academic houses in better order. I hope COPA acts. We in the institutions must act.

Notes

1. Logan Wilson, *The Academic Man* (New York: Oxford University Press, 1942), p. 105.
2. David Riesman, *Constraint and Variety in American Education* (New York: Doubleday & Company, Inc., 1956).
3. John J. Corson, *Governance of Colleges and Universities* (New York: McGraw-Hill, 1960).

Commentary

Kenneth E. Young

Dr. Kells did an excellent job in his paper, but (perhaps because of limitations of time), he does not address an important dimension of the institution/accreditation equation—a dimension that best can be described by the phrase "differing perspectives" or, in some instances, perhaps, "hidden agendas."

Example: It is true that the institutional, as contrasted with the specialized, accrediting agencies are creatures of their member institutions; but institutions can and do regard accreditation quite differently. Distinguished institutions often tend to treat institutional accreditation as something of an annoyance, to be put up with because it is considered to be good for others. Most marginal institutions see accreditation (or, more precisely, the lack of it) as a threat and therefore will make every effort to hide their faults and "placate the gods." Only a relatively small number of institutions, unfortunately, view the accrediting process for what it really should be—an important opportunity to evaluate their effectiveness and to profit from the consultative services of experienced peers.

Further, individuals within institutions exhibit varying degrees of understanding of and support for accreditation. In fact, most faculty members are not at all well informed about accreditation—its purposes, its values, its limitations. Also, a scandalously small number of institutional representatives (particularly presidents) have seen accreditation as of sufficient importance to justify their devoting a portion of their time to serve as volunteers on teams and on commissions—despite the fact that volunteers are the lifeblood of the accrediting process, and despite the fact that volunteers consistently report that such service has been an extremely useful learning experience.

Example: Specialized accrediting agencies are not, as Kells seems to suggest, creatures of the institutions whose units or programs they accredit. Specialized accreditation is sponsored by one or more professional associations. Most of the professional bodies that sponsor such accrediting activities originally become involved because of their prior interest in the credentialing (licensing or certification) of practitioners. Graduation from an accredited program is seen as one prerequisite to credentialing, intended to attest to the fact that an applicant has been exposed to certain professional practices.

Only the more mature and sophisticated of the professional organizations eventually come to see their accrediting activities as primarily concerned with the improvement of educational quality *within the context of the institution* (and this seems to occur more often with the professional associations made up of educators rather than of practitioners). In many professional associations, tension tends to exist between the practitioners and the educators—tension which usually is dealt with by having the practitioners concentrate primarily on credentialing while the educators concern themselves with accreditation. The practitioners, however, usually hold the ultimate authority over accreditation matters, although they rarely exercise it.

Kenneth E. Young is president of the Council on Postsecondary Accreditation.

The problem is exacerbated by the fact that many professional organizations have successfully achieved state licensing requirements that include, as a prerequisite to licensing, that a person be graduated from a program accredited by a named professional association. Newly-emerging professions or sub-professions are following this same pattern. Every state credentialing or licensing law or regulation that specifies a particular accrediting agency by name complicates the accreditation picture, limits flexibility and the capacity for change, and makes "voluntary" accreditation non-voluntary.

Current Issues in Higher Education

Copies of the 1979 and 1980 *Current Issues in Higher Education* are available individually or in sets. Bulk discounts available. Order from American Association for Higher Education, One Dupont Circle, Suite 780, Washington, D.C. 20036; 202/293-6440. Payment must accompany all orders under $15. Orders for three or fewer papers must add $1 handling charge. Ten percent handling charge added to all orders that must be billed.

1980 Series
Complete set $15

1. Improving Teaching and Institutional Quality ($3.50) ■ When Does A College Deserve To Be Called "High Quality"?—Alexander W. Astin ■ Measuring the Quality of Student Effort—C. Robert Pace ■ Commentary on Pace—Mark Curtis ■ The Changing Roles and Priorities of Academic Advising—Toni B. Trombley and David Holmes ■ Teaching Improvement Strategies: How Effective Are They?—Robert J. Menges ■ Are Instructional Improvement Programs Off-Target?—Robert T. Blackburn, Glen Pellino, Alice Boberg, and Colman O'Connell ■ What Are the Obstacles to Improving Quality Teaching?—Hans O. Mauksch

2. Funding Quality Improvement: Lessons from the FIPSE Experience—Charles I. Bunting ■ Commentary on Bunting—Charles Bingman, Sol Pelavin, Kenneth W. Tolo ■ **Proliferation and Agency Effectiveness in Accreditation: An Institutional Bill of Rights**—H. R. Kells ■ Commentary on Kells—Robert L. Ketter, William H. Knisely, Kenneth E. Young ($3.50)

3. Differing Perspectives on Declining Faculty Salaries ($2.50) ■ How Well Are Faculty Paid? Implications of the Academic Reward Structure—Kristine E. Dillon and Robert H. Linnell ■ The Economic Decline of the Professoriate in the 80's: What Happened to Faculty Salaries and What Are the Implications?—Peggy Heim

4. New Models for General Education ($2.50) ■ General Education for a Contemporary Context—Jerry G. Gaff ■ Quality and the Campus: The High School/College Connection—Ernest L. Boyer ■ Curricular Priorities for the 80's: Beyond Retrenchment—John C. Sawhill

5. Integrating Adult Development Theory with Higher Education Practice ($2.50) ■ Adult Development: A Workable Vision for Higher Education—Arthur W. Chickering ■ Faculty and Student Development in the 80's: Renewing the Community of Scholars—L. Lee Knefelkamp

6. Strategies for Retrenchment: National, State, Institutional ($3.50) ■ Basing Public Policy on Student Achievement: A New Agenda Item—Francis Keppel ■ Commentary on Keppel—Willard L. Boyd, Alice J. Irby, Elizabeth H. Johnson, Thurston E. Manning ■ New Roles for the States in Monitoring Higher Education Quality—Carl Kaysen and the Sloan Commission on Government and Higher Education ■ The Management of Universities of Constant or Decreasing Size—Richard M. Cyert

1979 Series
Complete set $12.50

1. Perspectives on Leadership ($2) ■ Changing the Shape of Work: Reform in Academe—Rosabeth Moss Kanter ■ Changing Values: Implications for Major Social Institutions—Morton Darrow ■ Leadership Needs of the 1980's—Michael Maccoby

2. Faculty Career Development ($2.50) ■ The Work Experience of American College Professors: Some Data and an Argument—Everett Carll Ladd, Jr. ■ Adult and Career Development: What Are the Implications for Faculty?—Roger Baldwin ■ Academic Careers and Adult Development: A Nexus for Research—B. Claude Mathis ■ Academic Careers: Patterns and Possibilities—Robert T. Blackburn ■ Engaging Junior Faculty in Career Planning: Alternatives to the Exit Interview—Barbara Lazarus and Martha Tolpin ■ Growth Contracts: Viable Strategy for Institutional Planning Under Changing Conditions—Allan O. Pfnister, Jill Solder, and Nina Verroca

3. Premises of Federal Student Assistance ($1.50) ■ Why Strains on Need-Based Financial Aid Are Increasing and Some Options for Relieving Them—Kenneth M. Deitch ■ How Good Is the Student Financial Aid System?—Martin Kramer ■ Premises of Student Assistance: It Isn't Time for a New Look—Marshall S. Smith

4. Employment Priorities in Academe ($2) ■ Age, Sex, and Ethnic Trade-Offs in Faculty Employment: You Can't Have Your Cake and Eat It Too—Robert H. Linnell ■ You've Come a Long Way, Maybe—Or Why It Still Hurts To Be a Woman in Labor—Bernice Resnick Sandler ■ Can There Be Anything Affirmative About Affirmative Action in the 1980's?—Frank Newman

5. Assessment ($2.50) ■ Defining and Measuring the Competencies of a Liberal Arts Education—David G. Winter ■ Statewide Assessment of Basic Skills—Alice J. Irby ■ Identifying and Evaluating Major Elements in the Quality of Student Life—Thomas R. Plough ■ What Is the Most Effective Way To Handle Program Discontinuance?—Edward A. Dougherty ■ How Do You Know a Good College When You Stumble Over One?—John Harris

6. Tenure ($2) ■ The History of Tenure—Walter P. Metzger ■ The Poverty of Historicism: A Critique of Walter Metzger's Defense of Tenure—James O'Toole ■ The Concept of Tenure and an Alternative—Penina M. Glazer

7. PhDs in Nonacademic Careers: Are There Good Jobs?—Lewis C. Solomon ■ **Robots or Reinsmen: Job Opportunities and Professional Standing for Collegiate Administrators in the 1980's**—Robert A. Scott ($2)